Mr. Ray Brooks Styline Industries, Inc. – Plant #1 431 Fourth Street P.O. Box 100 Huntingburg, IN 47542-0100

Re: 037-12341-00054

First Minor Permit Modification to

Part 70 037-5915-00054

Dear Mr. Brooks:

Styline Industries, Inc. – Plant #1 was issued a Part 70 permit on December 17, 1998 for a wood furniture manufacturing facility. A letter requesting to add units to the source was received on December 16, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved (bolded language has been added, the language with a line through it has been deleted):

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary source that operates a wood furniture manufacturing plant.

Responsible Official: Mr. Robert H. Menke, Jr., President Mr. Darlo Pack, President, CEO

The following changes have been made to incorporate exempt emission units being constructed in Plant #1 (originally located in Plant #6, under Exemption 037-3126):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (b) Woodworking Operations, equipped with (5) baghouses used for particulate control:
 - (1) Two (2) woodworking operations, identified as emission units X and Z, with a maximum capacity of 2400 pounds per hour each, using baghouses as control and exhausting to a baghouse at stacks #20 and 21, respectively.
 - (2) Machining operations, with a maximum capacity of 4, 167 pounds of material per hour, and exhausting to (4) baghouses.
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
 - (a) This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):
 - (1) Hand sanding operations
 - (2) Waterborne spray adhesive booth for plastic lay-up.

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Permit Reviewer: Kimberly Titzer

- (b) This stationary source also includes the following insignificant activities which are not specifically regulated:
 - (1) Wemhoner gas-fired veneer presses with process steam.
 - (2) Water-based glue, roll coat applicator and press for plastic lay-up.
 - (3) Waterborne roll coat, top fill application.
 - (4) Waterborne roll coat, glue size application.

SECTION D.2 FACILITY OPERATION CONDITIONS - Woodworking Operations

Facility Description [326 IAC 2-7-5(15)]

Woodworking Operations, equipped with (5) baghouses used for particulate control:

- (a) Two (2) woodworking operations, identified as emission units X and Z, with a maximum capacity of 2400 pounds per hour each, using baghouses as control and exhausting to a baghouse at stacks #20 and 21, respectively.
- (b) Machining operations, with a maximum capacity of 4, 167 pounds of material per hour, and exhausting to (4) baghouses.

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

The following change has been made because Styline Industries, Inc. does not wish to have the woodworking and machining operations listed as insignificant activities:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.3 Baghouse limitations

Baghouse limitations: The baghouse does not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic feet of outlet air.

The following changes were made based on revised language since TV037-5915 was issued:

Compliance Determination Requirements

D.2.5 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the woodworking and machinery-machining operations is are in operation. If abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.2.8 Broken or Failed Bag Detection
 In the event that bag failure has been observed:
 - (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated

Styline Industries, Inc. – Plant #1 Huntingburg, Indiana

Permit Reviewer: Kimberly Titzer

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process will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Kimberly Titzer, at (800) 451-6027, press 0 and ask for extension (3-8396), or dial (317) 233-8396.

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Management

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CC: File - Dubois County
U.S. EPA, Region V
Dubois County Health Department
Air Compliance Section Inspector – Ray Schick
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner
Styline Industries, Inc. – John Wirthwein

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

Styline Industries, Inc. – Plant #1 (Formerly Executive Furniture, Inc.) 4611 S. 400 West Huntingburg, Indiana 47542

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T037-5915-00054	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: December 17, 1998

First Minor Permit Modification No.: 037-12341	Revised pages: 5, 7, 37, 38, 39
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Executive Furniture, Inc. First Minor Permit Modification No.: 037-12341 Page 5 of 42
Huntingburg, Indiana Permit Reviewer: Kimberly Titzer OP No. T037-5915-00054
Permit Reviewer: Karen Purtell

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary source that operates a wood furniture manufacturing plant.

Responsible Official: Mr. Robert H. Menke, Jr., President

Source Address: 4611 S. 400 West, Huntingburg, Indiana 47542 Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542-0100

SIC Code: 2521

County Location: Dubois County

County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program

Minor Source, under PSD

Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) The following surface coating operations:
 - (1) One (1) finish booth, identified as emission unit A, with a maximum capacity of 1.52 units per hour, using dry filters as control, and exhausting to stack #1.
 - (2) One (1) Deburg NGR booth, identified as emission unit B1, with a maximum capacity of 18.32 units per hour, using dry filters as control, and exhausting to stack #2.
 - (3) One (1) Deburg SAP booth, identified as emission unit B2, with a maximum capacity of 18.32 units per hour, using dry filters as control, and exhausting to stack #3.
 - (4) One (1) Deburg stain booth, identified as emission unit C, with a maximum capacity of 18.32 units per hour, using dry filters as control, and exhausting to stack #5.
 - (5) One (1) Deburg sealer booth, identified as emission unit D, with a maximum capacity of 18.32 units per hour, using dry filters as control, and exhausting to stack #6.

Executive Furniture, Inc. Huntingburg, Indiana Permit Reviewer: Karen Purtell First Minor Permit Modification No.: 037-12341 Permit Reviewer: Kimberly Titzer

Woodworking Operations, equipped with (5) baghouses used for particulate control:

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- (1) Woodworking operations, with a maximum capacity of 2400 pounds per hour each, exhausting to a baghouse at stack #20.
- (2) Machining operations, with a maximum capacity of 4, 167 pounds of material per hour, and exhausting to (4) baghouses.
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
 - (a) This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):
 - (1) Hand sanding operations
 - (2) Waterborne spray adhesive booth for plastic lay-up.
 - (b) This stationary source also includes the following insignificant activities which are not specifically regulated:
 - (1) Wemhoner gas-fired veneer presses with process steam.
 - (2) Water-based glue, roll coat applicator and press for plastic lay-up.
 - (3) Waterborne roll coat, top fill application.
 - (4) Waterborne roll coat, glue size application.
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]
 This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:
 - (a) It is a major source, as defined in 326 IAC 2-7-1(22);
 - (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

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Huntingburg, Indiana Permit Reviewer: Karen Purtell

SECTION D.2 FACILITY OPERATION CONDITIONS - Woodworking **Operations**

Facility Description [326 IAC 2-7-5(15)]

Woodworking Operations, equipped with (5) baghouses used for particulate control:

- (a) Woodworking operations, with a maximum capacity of 2400 pounds per hour each, exhausting to a baghouse at stack #20.
- (b) Machining operations, with a maximum capacity of 4, 167 pounds of material per hour, and exhausting to (4) baghouses.

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 4.6 pounds per hour each when operating at a process weight rate of 2400 pounds per hour each.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

D.2.2 Opacity

Pursuant to CP 037-3133, issued on August 3, 1994, the particulate matter emissions from the woodworking operations shall be considered in compliance with 326 IAC 6 provided that the visible emissions do not exceed 10% opacity.

Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the woodworking and machining operations are in operation.

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Huntingburg, Indiana Permit Reviewer: Karen Purtell

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

Visible Emissions Notations

- Daily visible emission notations of the woodworking baghouse stack exhaust (a) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- The Compliance Response Plan for this unit shall contain troubleshooting (e) contingency and response steps for when an abnormal emission is observed.

D.2.7 **Baghouse Inspections**

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 **Record Keeping Requirements**

To document compliance with Condition D.2.6, the Permittee shall maintain (a) records of daily visible emission observations of each baghouse stack exhaust. Executive Furniture, Inc. First Minor Permit Modification No.: 037-12341 Page 39 of 42 Huntingburg, Indiana Permit Reviewer: Kimberly Titzer OP No. T037-5915-00054 Permit Reviewer: Karen Purtell

(b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.